

**BOBBY JINDAL**  
GOVERNOR



**PEGGY M. HATCH**  
SECRETARY

**State of Louisiana**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**ENVIRONMENTAL SERVICES**

Certified Mail No.:

Activity No.: PER20090024  
Agency Interest No.: 1255

Ms. Esther Liggio  
Environmental Manager  
PPG Industries, Inc.  
P. O. Box 1000  
Lake Charles, LA 70602

RE: Part 70 Operating Permit Renewal and Modification, Lake Charles Complex – Greater EDC Unit, PPG Industries, Inc., Lake Charles, Calcasieu Parish, Louisiana

Dear Ms. Liggio:

This is to inform you that the permit renewal and modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the \_\_\_\_ of \_\_\_\_\_, 2015, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this \_\_\_\_\_ day of \_\_\_\_\_, 2010.

Permit No.: 2350-V2

Sincerely,

Cheryl Sonnier Nolan  
Assistant Secretary  
CSN:QMZ  
c: EPA Region VI

**PUBLIC NOTICE**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)**  
**PPG INDUSTRIES, INC., LAKE CHARLES COMPLEX, GREATER EDC UNIT**  
**PROPOSED PART 70 AIR OPERATING PERMIT RENEWAL AND MODIFICATION**

The LDEQ, Office of Environmental Services, is accepting written comments on the proposed Part 70 air operating permit renewal and modification for PPG Industries, Inc., P. O. Box 1000, Lake Charles, LA 70602 for the Lake Charles Complex – Greater EDC Unit. **The facility is located at 1300 PPG Dr., Westlake, Calcasieu Parish.**

PPG Industries, Inc., a chemical manufacturing facility, requested a permit renewal and modification to the Part 70 Air Operating Permit No. 2350-V1 for the Greater EDC Unit, which was issued on August 14, 2009. With this renewal and modification, a new portable carbon drum is added as a potential alternative control device. Additionally, the TCE Storage Tank has been demolished and is therefore deleted from the permit. The reconciliation of certain emission limits, due to new test data, improved emission factors and other improved information, is also made in this permit.

Estimated emissions from the facility in tons per year are as follows:

Pollutant	Before	After	Change
PM <sub>10</sub>	4.58	4.58	-
SO <sub>2</sub>	-	-	-
NO <sub>x</sub>	-	-	-
CO	0.07	0.07	-
VOC	18.36	41.95	+ 23.59

A technical review of the working draft of the proposed permit was submitted to the facility representative and the LDEQ Surveillance Division. Any remarks received during the technical review will be addressed in the "Worksheet for Technical Review of Working Draft of Proposed Permit". All remarks received by LDEQ are included in the record that is available for public review.

Written comments, written requests for a public hearing or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Thursday, March 18, 2010.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The permit application, proposed permit, statement of basis, and worksheet for technical review are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5<sup>th</sup> Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at [www.deq.louisiana.gov](http://www.deq.louisiana.gov).**

Additional copies may be reviewed at the Calcasieu Parish Library, Westlake Branch, 937 Mulberry Street, Westlake, LA 70669-4601 and the Calcasieu Parish Library, Sulphur Regional Branch, 1160 Cypress Street, Sulphur, LA 70663-5111.

Inquiries or requests for additional information regarding this permit action should be directed to Dr. Qingming Zhang, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3140.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at [deqmailrequest@la.gov](mailto:deqmailrequest@la.gov) or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

**Permit public notices including electronic access to the proposed permit and statement of basis can be viewed at the LDEQ permits public notice webpage at [www.deq.louisiana.gov/apps/pubNotice/default.asp](http://www.deq.louisiana.gov/apps/pubNotice/default.asp) and general information related to the public participation in permitting activities can be viewed at [www.deq.louisiana.gov/portal/tabid/2198/Default.aspx](http://www.deq.louisiana.gov/portal/tabid/2198/Default.aspx).**

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at [http://www.doa.louisiana.gov/oes/listservpage/ldeq\\_pn\\_listserv.htm](http://www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm).

**All correspondence should specify AI Number 1255, Permit Number 2350-V2, and Activity Number PER20090024.**

**Scheduled Publication Date: February 11, 2010**

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**AIR PERMIT BRIEFING SHEET  
AIR PERMITS DIVISION  
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Lake Charles Complex – Greater EDC Unit  
Agency Interest No. 1255  
PPG Industries, Inc.  
Westlake, Calcasieu Parish, Louisiana**

**I. Background**

The Lake Charles Complex is a chemical manufacturing facility. It is organized into the following units/areas: VC Production, Power/Utilities, Silicas, Complex Support Facilities, Chlor/Alkali Plant, Mercury Recovery, Membrane, Derivatives Docks, Derivatives Shipping, Derivatives Plant Common Sources, Greater EDC, Waste Recovery, Per/Tri, TE-2, and Incinerators Area.

This is a permit renewal and modification to Part 70 Operating Permit No. 2350-V1 for the Greater EDC Unit, which was issued on August 14, 2009.

**II. Origin**

A permit application dated August 20, 2009 was submitted requesting a Part 70 operating permit renewal and modification for the referenced facility.

**III. Description**

The Greater EDC Unit covered under this permit produces:

- Ethylene dichloride (1,2-dichloroethane or EDC),
- Trans-1,2-dichloroethylene (VersaTRANS™),
- Vinylidene chloride monomer (1,1-dichloroethylene or VDCM),
- Ethyl chloride (chloroethane or EC), and
- Hydrochloric acid (HCl).

Process descriptions for the Greater EDC Unit are given below.

Liquid Phase (LP) EDC Production

EDC is produced by the liquid-phase process in the EDC process unit, which consists of No. 1 LP-EDC and No. 2 EDC plants. The EDC is formed by an exothermic reaction between chlorine and ethylene in the presence of a catalyst.

Ethylene and chlorine flow into the bottom of the reactor and react in the reactor liquor composed primarily of EDC. The heat of reaction boils the EDC overhead where it is condensed. Some of the condensed EDC is recycled back into the reactor with the rest going to the HCl stripper. The stripper removes any dissolved HCl or other gases from the EDC. Heavy impurities from the reaction process are then removed by distillation and are sent to

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the recovery still. The EDC product is used as a feedstock for Derivatives Plant products or is shipped by barge, ship, truck, or rail to customers.

Process vent gases are combusted in facilities covered by a separate permit (for the Incinerators Area). Tars and spent catalyst from the LP-EDC production process are either reused, recycled or are combusted.

VersaTRANS™ Production

VersaTRANS™ is produced from a feedstock of light chlorinated hydrocarbons that are by-products (lights) from the Per/Tri production unit. The lights that consist primarily of trans-1,2-dichloroethylene (Trans) and cis-1,2-dichloroethylene (Cis) are routed to a stripper to remove any HCl or other non-condensable impurities. The stream is then sent to the product still where a catalyst is added to convert Cis to Trans. The Trans is filtered and shipped to customers. Process vent gases are sent to the combustion devices covered in a separate permit (Incinerators Area).

VDCM Production

The VDCM production unit consists of two sections. The first section distills TCE (1,1,2-trichloroethane) feedstock from a Derivatives Plant byproduct stream, and the second section converts the TCE to VDCM product.

First, from a by-product stream produced elsewhere in the Derivatives Plant, TCE is separated from a mixture of TCE, symmetrical Tetra (1,1,2,2-tetrachloroethane), and unsymmetrical Tetra (1,1,1,2-tetrachloroethane). The mixture is fed to the heavies still to separate the TCE from the heavier components. Then, the TCE Stripper removes trace amounts of light impurities. The light impurities and the heavier components are used as feedstock for chlorinated solvent production. The resulting high-purity TCE is routed to the VDCM reactor, where the TCE reacts with caustic soda to produce VDCM, sodium chloride, and water.

The salt water is separated from the VDCM using phase separation and azeotropic distillation in a drying still. The VDCM is sent to the VDC Still that separates the VDCM from heavy impurities. VDCM is then stabilized and sent to customers by railcars and tank trucks.

Process water is treated onsite in NPDES/LPDES facilities and process vent gases are combusted. Process vent gases are sent to the combustion devices covered in a separate permit (Incinerators Area).

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Ethyl Chloride Production

The ethyl chloride (chloroethane or EC) production unit is designed to produce a high purity liquid EC by reacting ethylene and HCl in a liquid-phase reactor in the presence of a catalyst. The heat of reaction is removed by circulating a portion of the reactor liquor through coolers.

The reacted stream overflows to a flasher where tars and spent catalyst are removed. Process gases are cooled and routed to a stripper, where excess HCl gas is removed. Further distillation of the EC stream removes the remaining impurities. The finished EC product is pumped to storage prior to being shipped to customers by trucks, railcars, and ships.

Process vent gases are fed to a system of vent condensers for recovery of any EC vapor. Condensed EC is routed back to the distillation process. Non-condensables are routed to the complex HCl distribution header to be used as feedstock in other Derivatives process units or are routed to the combustion devices covered in a separate permit (Incinerators Area).

HCl Production

The HCl unit consists of two processes – HCl Absorption and Metals Removal.

In the absorbers, strong acid is formed by the absorption of HCl gas in weak acid. The HCl gas passes through carbon bed filters to remove trace amount of organic impurities before entering the absorber. The heat of absorption is removed by cooling water flowing through the shell side of the absorber.

The resulting strong HCl acid is removed from the bottom of the absorber and pumped into a process vessel. Non-condensables and unabsorbed HCl gas leave the bottom of the absorber and are fed into the bottom of the tails tower, where they come in contact with weak. In the tails tower, weak acid is used to recover the unabsorbed HCl gas from the non-condensable stream. The gas stream is then routed to the tails tower vent scrubber before exiting into the atmosphere.

The Metals Removal System is used to recover usable hydrochloric acid from metals contaminated wastewater streams within Derivatives. A vaporized HCl/water stream is condensed and routed to storage. The metals contaminated stream exiting the process is routed to PPG's NPDES/LPDES system for treatment.

Recovery Operations

The Derivatives Plant is a highly integrated production area with many inter-unit transfers of product intermediates. EDC, for example, is a feedstock for several Derivatives processes. Within the LP-EDC production area are facilities that are used to treat by-product streams

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**Westlake, Calcasieu Parish, Louisiana**

from the Derivatives Plant. Product from the Waste Recovery Unit and distillation bottoms from the LP-EDC unit are fed to the Recovery Still for further distillation. EDC from these streams is recovered in the Recovery Still distillation overhead and is recycled as feedstock within Derivatives.

Recovery Still distillation bottoms are then, normally, processed through the ECB still to remove impurities, which can affect product purity in the Per/Tri Production Unit. ECB still bottoms provide feedstock for both the Per/Tri and VDCM processes.

With this renewal and modification, a new portable carbon drum is added as a potential alternative control device. Additionally, the TCE Storage Tank has been demolished and is therefore deleted from the permit. The reconciliation of certain emission limits, due to new test data, improved emission factors, and other improved information, is also made in this permit.

Estimated emissions from the facility in tons per year are as follows:

Pollutant	Before	After	Change
PM <sub>10</sub>	4.58	4.58	-
SO <sub>2</sub>	-	-	-
NO <sub>x</sub>	-	-	-
CO	0.07	0.07	-
VOC*	18.36	41.95	+ 23.59

**\*VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):**

Pollutant	Before	After	Change
1,1,2,2-Tetrachloroethane	-	< 0.01	< 0.01
1,1,2-Trichloroethane	1.58	0.09	- 1.49
1,1-Dichloroethane	0.01	0.03	+ 0.02
1,2-Dichloroethane	0.92	4.359	+ 3.439
Carbon Tetrachloride	-	0.01	+ 0.01
Chloroethane	0.47	1.81	+ 1.34
Chloroform	0.03	0.46	+ 0.43
Dichloromethane	-	< 0.01	< 0.01
Hexachloroethane	-	0.02	+ 0.02
Methyl Chloride	-	< 0.01	< 0.01
Trichloroethylene	0.02	0.15	+ 0.13
Vinyl chloride	0.36	0.01	- 0.35
Vinylidene chloride	0.05	< 0.01	- 0.05
<b>Total</b>	<b>3.44</b>	<b>6.94</b>	<b>+ 3.50</b>

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Other VOC (TPY): 35.01

**IV. Type of Review**

This application was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). PSD review is not required.

This facility is part of a major source of toxic air pollutants.

**V. Credible Evidence**

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

**VI. Public Notice**

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, and in the *American Press*, Lake Charles, on [date]. In addition, copies of the public notice were sent to individuals included in the LDEQ mailing list on [date]. The proposed permit was also submitted to US EPA Region VI for review on [date]. All comments will be considered prior to a final permit decision.

**VII. Effects on Ambient Air**

Emissions associated with the proposed modification were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

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**VIII. General Condition XVII Activities**

Work Activity	Schedule	Emissions (TPY)
EO1 – Sampling (EDC)	4.5 sample/day	VOCs: 0.01
EO2 – Clearing Catalyst Pot to Add Catalyst (EDC)	1 event/week	VOCs: < 0.01
EO3 – Disconnecting Loading/Unloading Hoses (EDC)	1 event/day	VOCs: < 0.01
EO4 – Clearing Filters to Replace Cartridges (EDC)	1 event/week	VOCs: < 0.01
EO5 – Portable Drier/Decolorizer (EDC)	1 event/week	VOCs: < 0.01
EO6-1 – Carbon Bed Use for EDC Day Tanks 7 & 8 (EDC)	240 hrs/year	VOCs: 0.01
EO6-2 – Carbon Bed Use for EDC Million Gallon Tank (EDC)	240 hrs/year	VOCs: 0.02
VO1 – Sampling (VDCM)	2 samples/day	VOCs: < 0.01
VO2 – Clearing Catalyst Pot to Add Catalyst (VDCM)	Various	VOCs: 0.02
VO3 – Disconnecting Loading/Unloading Hoses (VDCM)	1 event/day	VOCs: < 0.01
ECO1 – Sampling (EC/HCl)	2 samples/day	VOCs: < 0.01; Other: < 0.01
ECO2 – Clearing Catalyst Pot to Add Catalyst (EC/HCl)	2 events/day	VOCs: 0.01; Other: < 0.01
ECO3 – Disconnecting Loading/Unloading Hoses (EC/HCl)	1 event/day	VOCs: < 0.01; Other: < 0.01
ECO4 – Clearing Acid Filters to Replace Socks (EC/HCl)	1 event/week	Other: < 0.01
EM1 – Clearing Pumps (EDC)	26 events/year	VOCs: < 0.01
EM2 – Clearing Piping (EDC)	-	VOCs: < 0.01
EM3 – Clearing Instruments (EDC)	-	VOCs: < 0.01
EM4 – Clearing Tanks (EDC)	4 events/year	VOCs: 0.14
EM6 – Clearing for No. 1 Unit Outages (EDC)	2 events/year	VOCs: 0.04
EM7 – Clearing for No. 2 Unit Outages (EDC)	2 events/year	VOCs: 0.03
EM8 – Clearing for No. 3 Unit Outages (EDC)	8 events/year	VOCs: 0.03; Other: < 0.01
EM10 – Prooftesting Incinerator Vent System (EDC)	2 minutes/year	VOCs: 0.01; Other: < 0.01
EM12 – Shop Parts Cleaner (EDC)	-	VOCs: < 0.01
VM1 – Clearing Pump (VDCM)	65 events/year	VOCs: < 0.01
VM2 – Clearing Piping (VDCM)	-	VOCs: < 0.01
VM3 – Clearing Instruments (VDCM)	-	VOCs: < 0.01
VM4 – Clearing Tanks (VDCM)	11 events/year	VOCs: 0.01
VM6 – Clearing for No. 1 Unit Outages (VDCM)	3 events/year	VOCs: < 0.01
VM7 – Clearing for No. 2 Unit Outages (VDCM)	3 events/year	VOCs: 0.02
VM8 – Clearing for No. 3 Unit Outages (VDCM)	3 events/year	VOCs: 0.03
VM9 – Clearing Heavies Still (VDCM)	3 events/year	VOCs: 0.02
VM10 – Prooftesting Incinerator Vent System (VDCM)	2 minutes/year	VOCs: < 0.01
ECM1 – Clearing Pumps (EC/HCl)	26 events/year	VOCs: < 0.01; Other: < 0.01
ECM2 – Clearing Piping (EC/HCl)	-	VOCs: < 0.01; Other: < 0.01
ECM3 – Clearing Instruments (EC/HCl)	-	VOCs: < 0.01; Other: < 0.01
ECM4 – Clearing Tanks (EC/HCl)	14 events/year	VOCs: 0.03; Other: 0.04
ECM6 – Clearing for EC Unit (EC/HCl)	2 events/year	VOCs: 0.01; Other: < 0.01
ECM7 – Clearing for HCl Plant (EC/HCl)	3 to 6 events/year	Other: < 0.01

Note: Other = Non-VOC TAPs.

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**IX. Insignificant Activities**

<b>ID No.</b>	<b>Description</b>	<b>Citation</b>
IA01	No. 1 VersaTRANS Stripper Process Stream Analyzer	LAC 33:III.501.B.5.A.9
IA02	No. 2 EDC Heavy Still Process Stream Analyzer	LAC 33:III.501.B.5.A.9
IA03	No. 3 EDC Heavy Still Process Stream Analyzer	LAC 33:III.501.B.5.A.9
IA04	No. 1 EDC Reactor Process Vent Oxygen Analyzer A	LAC 33:III.501.B.5.A.9
IA05	No. 1 EDC Reactor Process Vent Oxygen Analyzer B	LAC 33:III.501.B.5.A.9
IA06	No. 1 EDC Reactor Process Vent Chlorine Analyzer	LAC 33:III.501.B.5.A.9
IA07	No. 1 EDC Reactor Process Vent Ethylene Analyzer A	LAC 33:III.501.B.5.A.9
IA08	No. 1 EDC Reactor Process Vent Ethylene Analyzer B	LAC 33:III.501.B.5.A.9
IA09	No. 3 EDC Reactor Process Vent Oxygen Analyzer A	LAC 33:III.501.B.5.A.9
IA10	No. 3 EDC Reactor Process Vent Oxygen Analyzer B	LAC 33:III.501.B.5.A.9
IA11	No. 3 EDC Reactor Process Vent Chlorine Analyzer	LAC 33:III.501.B.5.A.9
IA12	No. 3 EDC Reactor Process Vent Ethylene Analyzer A	LAC 33:III.501.B.5.A.9
IA13	No. 3 EDC Reactor Process Vent Ethylene Analyzer B	LAC 33:III.501.B.5.A.9
IA14	VDCM Process Analyzer A	LAC 33:III.501.B.5.A.9
IA15	VDCM Process Analyzer B	LAC 33:III.501.B.5.A.9
IA16	Catalyst Addition Operations	LAC 33:III.501.B.5.A.11
IA17	Portable Cooling Towers	LAC 33:III.501.B.5.A.12
IA18	Unit Lab.	LAC 33:III.501.B.5.A.6
IA19	Portable Fuel Tanks	LAC 33:III.501.B.5.A.8

**Lake Charles Complex – Greater EDC Unit**  
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**Westlake, Calcasieu Parish, Louisiana**

**X. Table 1. Applicable Louisiana and Federal Air Quality Requirements**

ID No.	Description	LAC 33:III. Chapter																					
		5 <sup>A</sup>	509	9	11	13	15	2103	2104*	2107	2113	2115	2116*	2147	22	29*	51*	53*	56	59*			
UNF010	Greater EDC			1	1	1					1	1									1	1	
EQT487	300 - No. 1 LP-EDC Scrubber											3											
EQT488	301 - No. 2 LP-EDC Scrubber											3											
EQT489	302 - VDCM/VersaTrans Scrubber											3											
EQT490	337 - VCM-1 Plant Scrubber											3											
EQT491	338 - HCl Tails Tower Scrubber											2											
EQT493	373 - North Rubber Lined Acid Storage Tank																						
EQT494	374 - South Rubber Lined Acid Storage Tank																						
EQT495	533D - Cooling Tower, EDC/VersaTrans																						
EQT496	533E - Cooling Tower, EC/HCl																						
EQT497	60A-T-109 - No. 1 EDC Day Tank																						
EQT498	60A-T-110 - No. 2 EDC Day Tank																						
EQT499	60A-T-202 - No. 3 EDC Day Tank																						
EQT500	60A-T-201 - No. 6 EDC Day Tank																						
EQT501	60A-T-304 - No. 7 EDC Day Tank																						
EQT502	60A-T-307 - No. 8 EDC Day Tank																						
EQT503	60A-T-308 - Heavies Still Bottoms Tank																						
EQT504	60A-T-3 - EDC Million Gallon Tank																						
EQT505	61A-T-313 - No. 1 VDCM Storage Tank																						
EQT506	61A-T-312 - No. 2 VDCM Storage Tank																						
EQT507	61A-T-311 - No. 4 VersaTrans Storage Tank																						
EQT508	61A-T-61080 - No. 5 VDCM Storage Tank																						
EQT509	61A-T-109 - No. 1 VDCM Day Tank																						
EQT510	61A-T-114 - No. 2 VDCM Day Tank																						
EQT511	61A-T-17 - No. 3 VDCM Day Tank																						
EQT512	63G-T-61949 - No. 1 VersaTrans Product Tank																						
EQT513	61A-T-105 - No. 2 VersaTrans Product Tank																						
EQT514	60A-T-301 - No. 1 VersaTrans Feed/No. 3 EDC Dump Tank																						

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ID No.	Description	LAC 33:III.Chapter																			
		5 <sup>A</sup>	509	9	11	13	15	2103	2104*	2107	2113	2115	2116*	2147	22	29*	51*	53*	56	59*	
EQT515	61A-T-22 - No. 2 VersaTrans Feed Tank																				
EQT516	61A-T-23 - No. 3 VersaTrans Feed Tank																				
EQT517	61A-T-24 - No. 4 VersaTrans Feed Tank																				
EQT518	60A-T-1010 - No. 5 VersaTrans Feed/No. 1 EDC Dump Tank																				
EQT519	63G-T-62793 - No. 6 VersaTrans Feed Tank																				
EQT520	69A-T-39 - No. 7 VersaTrans Feed Tank																				
EQT521	69A-T-41 - No. 8 VersaTrans Feed Tank																				
EQT522	69A-T-42 - No. 9 VersaTrans Feed Tank																				
EQT525	69A-T-48 - No. 12 VersaTrans Feed Tank																				
EQT526	69A-T-49 - No. 12 VersaTrans Feed Tank																				
EQT527	64A-T-1 - EC Reactor Dump Tank																				
EQT528	64A-T-7 - EC Day Tank No. 1																				
EQT529	64A-T-8 - EC Day Tank No. 2																				
EQT530	64A-T-9 - EC Day Tank No. 3																				
EQT531	64A-T-10 - EC Day Tank No. 4																				
EQT534	62A-T-107 - No. 1 Strong Acid Tank																				
EQT535	62A-T-108 - No. 2 Strong Acid Tank																				
EQT536	62A-T-109 - No. 1 Weak Acid Tank																				
EQT537	62A-T-110 - No. 2 Weak Acid Tank																				
EQT542	562A - EDC Portable Carbon Drum Control CD 1-10																				
RLP365	61A-C-2 - Versa Trans Heavies Still System																				
RLP366	61A-C-1 - TCE Stripper System																				
RLP367	61A-C-10 - VDC DH Still System																				
RLP368	61A-C-3 - VDC Product Still System																				
RLP369	60A-T-1103 - No. 1 HCl Stripper System																				
RLP370	60A-C-300 - No. 2 HCl Stripper System																				
RLP371	60A-T-1101 - No. 4 HCl Stripper System																				
RLP372	60A-C-303 - No. 2 EDC Heavies Still System																				
RLP373	60A-C-208 - No. 3 EDC Heavies Still System																				

**Lake Charles Complex – Greater EDC Unit**  
**Agency Interest No. 1255**  
**PPG Industries, Inc.**  
**Westlake, Calcasieu Parish, Louisiana**

**X. Table 1. Applicable Louisiana and Federal Air Quality Requirements**

ID No.	Description	LAC 33:III.Chapter																			
		5 <sup>▲</sup>	509	9	11	13	15	2103	2104*	2107	2113	2115	2116*	2147	22	29*	51*	53*	56	59*	
RLP374	67D-C-101 - Recovery Still System											3		2							
RLP375	60A-T-310 - EDC Dopp Kettle System											3		2							
RLP376	67D-C-103 - ECB Still System											3		2							
RLP377	64A-C-1 - EC Primary Stripper System											3		3							
RLP378	64A-C-3 - EC Secondary Stripper System											3		3							
RLP379	64A-C-2 - EC Heavies Stripper System											3		3							
RLP380	64A-T-20 - EC Flasher Dopp System											3		3							
RLP381	64A-T-21 - EC Bottoms Dopp System											3		3							
RLP382	62A-E-118 - No. 2 HCl Absorber System											3		3							
RLP383	62A-E-108 - No. 4 HCl Absorber System											3		3							
RLP384	62A-E-107 - No. 5 HCl Absorber System											3		3							
RLP385	62A-C-102 - No. 2 HCl Tails Tower System											3		3							
RLP386	62A-C-104 - No. 4 HCl Tails Tower System											3		3							
RLP387	62A-C-105 - No. 5 HCl Tails Tower System											3		3							
RLP388	60A-R-1001 - No. 1 LP-EDC Reactor system											3		2							
RLP389	60A-R-301 - No. 3 LP-EDC Reactor system											3		2							
RLP390	61A-R-2 - VersaTrans Reactor System											3		2							
RLP391	61A-R-1 - EC Reactor System											3		2							

\* The regulations indicated above are State Only regulations.

▲ All LAC 33:III.Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

**KEY TO MATRIX**

- I -The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.

**Lake Charles Complex – Greater EDC Unit**  
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**PPG Industries, Inc.**  
**Westlake, Calcasieu Parish, Louisiana**

- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.





**Lake Charles Complex – Greater EDC Unit**  
**Agency Interest No. 1255**  
**PPG Industries, Inc.**  
**Westlake, Calcasieu Parish, Louisiana**

**X. Table 1. Applicable Louisiana and Federal Air Quality Requirements**

ID No.	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63 NESHAP						40 CFR	
		A	K	Ka	Kb	Db	Dc	VV	A	F	M	FF	A	F	G	H	NNNNN	Q	68	82	
RLP374	67D-C-101 - Recovery Still System																				
RLP375	60A-T-310 - EDC Dopp Kettle System																				
RLP376	67D-C-103 - ECB Still System																				
RLP377	64A-C-1 - EC Primary Stripper System																				
RLP378	64A-C-3 - EC Secondary Stripper System																				
RLP379	64A-C-2 - EC Heavies Stripper System																				
RLP380	64A-T-20 - EC Flasher Dopp System																				
RLP381	64A-T-21 - EC Bottoms Dopp System																				
RLP382	62A-E-118 - No. 2 HCl Absorber System																				
RLP383	62A-E-108 - No. 4 HCl Absorber System																				
RLP384	62A-E-107 - No. 5 HCl Absorber System																				
RLP385	62A-C-102 - No. 2 HCl Tails Tower System																				
RLP386	62A-C-104 - No. 4 HCl Tails Tower System																				
RLP387	62A-C-105 - No. 5 HCl Tails Tower System																				
RLP388	60A-R-1001 - No. 1 LP-EDC Reactor system																				
RLP389	60A-R-301 - No. 3 LP-EDC Reactor system																				
RLP390	61A-R-2 - VersaTrans Reactor System																				
RLP391	61A-R-1 - EC Reactor System																				

**KEY TO MATRIX**

- 1 - The regulations have applicable requirements that apply to this particular emission source. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.

**Lake Charles Complex – Greater EDC Unit**  
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**Westlake, Calcasieu Parish, Louisiana**

3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.  
Blank – The regulations clearly do not apply to this type of emission source.

**Lake Charles Complex – Greater EDC Unit**  
**Agency Interest No. 1255**  
**PPG Industries, Inc.**  
**Westlake, Calcasieu Parish, Louisiana**

<b>XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source</b>		
ID No.	Requirement	Notes
UNF010	NESHAP Subpart F – Vinyl Chloride [40 CFR 61.60]	Does not apply – Does not meet definition of EDC Plant. (This unit produces EDC via liquid phase reaction between ethylene and chlorine.)
EQT487 through EQT490	40 CFR 82 – Stratospheric Ozone Provisions [40 CFR 82 Subpart F] HON Subpart G – Process Vents, Storage Vessels, Transfer Operations, and Wastewater [40 CFR 63.110] Waste Gas Disposal [LAC 33:III.2115]	Does not apply – All sources subject to the requirements of 40 CFR 82 are covered under the permit for the Complex Support. Does not apply – Used for startup, shutdown, and malfunction only.
EQT491	NESHAP Subpart NNNNN – HCl Production [40 CFR 63.8985]	Does not apply – No liquid HCl product at a concentration of 30% by weight or greater is produced at this facility.
EQT493, EQT494, EQT534, EQT535, EQT536, EQT537	HON Subpart H – SO2 [40 CFR 63.100] Waste Gas Disposal [LAC 33:III.2115]	Does not apply – Not part of a HON CMPU. Exempt – Waste gas stream with a combined weight of VOCs ≤ 100 pounds in any continuous 24-hour period.
EQT495, EQT496	NESHAP Subpart NNNNN – HCl Production [40 CFR 63.8985]	Does not apply – No liquid HCl product at a concentration of 30% by weight or greater is produced at this facility.
EQT497 through EQT502, EQT504 through EQT508, EQT511, EQT513, EQT528 through EQT531	HON Subpart H – SO2 [40 CFR 63.100] NESHAP Subpart Q – Industrial Process Cooling Towers [40 CFR 63.400] NSPS Subpart Kb – Storage Vessels [40 CFR 60.110b]	Does not apply – Not part of a HON CMPU. Does not apply – No chromium-based water treatment chemicals are used. Does not apply – No construction, reconstruction, or modification after July 23, 1984.
EQT503, EQT509, EQT510, EQT512, EQT515, EQT516,	HON Subpart G – Process Vents, Storage Vessels, Transfer Operations, and Wastewater [40 CFR 63.110]	Does not apply – Vessel capacity < 38 m <sup>3</sup> .

**Lake Charles Complex – Greater EDC Unit**  
**Agency Interest No. 1255**  
**PPG Industries, Inc.**  
**Westlake, Calcasieu Parish, Louisiana**

<b>XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source</b>		
ID No.	Requirement	Notes
EQT517, EQT520, EQT525, EQT526	NSPS Subpart Kb – Storage Vessels [40 CFR 60.110b]	Does not apply – No construction, reconstruction, or modification after July 23, 1984.
EQT514, EQT518, EQT519, EQT521, EQT522, EQT527	HON Subpart H – Surge Control Vessels and Bottoms Receivers [40 CFR 63.170] NSPS Subpart Kb – Storage Vessels [40 CFR 60.110b]	Does not apply – Vessel capacity < 75 m <sup>3</sup> . Does not apply – No construction, reconstruction, or modification after July 23, 1984.
EQT534 through EQT537, RLP382 through RLP387	NESHAP Subpart NNNNN – HCl Production [40 CFR 63.8985]	Does not apply – No liquid HCl product at a concentration of 30% by weight or greater is produced at this facility.
RLP365 through RLP376, RLP388 through RLP391	Waste Gas Disposal [LAC 33:III.2115] SOCMI Reactor Processes and Distillation Operations [LAC 33:III.2147]	Does not apply – Subject to HON Subpart G. Exempt – Subject to HON Subpart G.
RLP377 through RLP387	Waste Gas Disposal [LAC 33:III.2115] SOCMI Reactor Processes and Distillation Operations [LAC 33:III.2147] HON Subpart H – SOCM I [40 CFR 63.100]	Does not apply – Vents are routed back to process and do not meet definition of a process vent.

The above table provides explanation for both the exemption status and non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

**INVENTORIES**

**AI ID: 1255 - PPG Industries Inc - Lake Charles Complex**  
**Activity Number: PER20090024**  
**Permit Number: 2350-V2**  
**Air - Title V Regular Permit Renewal**

**Subject Item Inventory:**

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
<b>Greater EDC</b>						
EQT 0487	300 - No. 1 LP-EDC Scrubber					16 hr/yr
EQT 0488	301 - No. 2 LP-EDC Scrubber					16 hr/yr
EQT 0489	302 - VDCM/VersaTrans Scrubber					8 hr/yr
EQT 0490	337 - VGM-1 Plant Scrubber					8 hr/yr
EQT 0491	338 - HCl Tails Tower Scrubber					8760 hr/yr
EQT 0493	373 - North Rubber Lined Acid Storage Tank	158647 gallons				8760 hr/yr
EQT 0494	374 - South Rubber Lined Acid Storage Tank	325890 gallons				8760 hr/yr
EQT 0495	533D - Cooling Tower, EDC/VersaTrans					8760 hr/yr
EQT 0496	533E - Cooling Tower, EC/HCl					8760 hr/yr
EQT 0497	60A-T-109 - No. 1 EDC Day Tank	27800 gallons				8760 hr/yr
EQT 0498	60A-T-110 - No. 2 EDC Day Tank	27800 gallons				8760 hr/yr
EQT 0499	60A-T-202 - No. 3 EDC Day Tank	27800 gallons				8760 hr/yr
EQT 0500	60A-T-201 - No. 6 EDC Day Tank	65400 gallons				8760 hr/yr
EQT 0501	60A-T-304 - No. 7 EDC Day Tank	90640 gallons				8760 hr/yr
EQT 0502	60A-T-307 - No. 8 EDC Day Tank	87200 gallons				8760 hr/yr
EQT 0503	60A-T-308 - Heavies Still Bottoms Tank	7430 gallons				8760 hr/yr
EQT 0504	60A-T-3 - EDC Million Gallon Tank	1.06 million gallons				8760 hr/yr
EQT 0505	61A-T-313 - No. 1 VDCM Storage Tank	68000 gallons				8760 hr/yr
EQT 0506	61A-T-312 - No. 2 VDCM Storage Tank	68000 gallons				8760 hr/yr
EQT 0507	61A-T-311 - No. 4 VersaTrans Storage Tank	68000 gallons				8760 hr/yr
EQT 0508	61A-T-61080 - No. 5 VDCM Storage Tank	22000 gallons				8760 hr/yr
EQT 0509	61A-T-109 - No. 1 VDCM Day Tank	5128 gallons				8760 hr/yr
EQT 0510	61A-T-114 - No. 2 VDCM Day Tank	5128 gallons				8760 hr/yr
EQT 0511	61A-T-17 - No. 3 VDCM Day Tank	18640 gallons				8760 hr/yr
EQT 0512	63G-T-61949 - No. 1 VersaTrans Product Tank	9200 gallons				8760 hr/yr
EQT 0513	61A-T-105 - No. 2 VersaTrans Product Tank	22000 gallons				8760 hr/yr
EQT 0514	60A-T-301 - No. 1 VersaTrans Feed/No. 3 EDC Dump Tank	17320 gallons				8760 hr/yr
EQT 0515	61A-T-22 - No. 2 VersaTrans Feed Tank	7500 gallons				8760 hr/yr
EQT 0516	61A-T-23 - No. 3 VersaTrans Feed Tank	7500 gallons				8760 hr/yr
EQT 0517	61A-T-24 - No. 4 VersaTrans Feed Tank	7500 gallons				8760 hr/yr
EQT 0518	60A-T-1010 - No. 5 VersaTrans Feed/No. 1 EDC Dump Tank	10500 gallons				8760 hr/yr
EQT 0519	63G-T-62793 - No. 6 VersaTrans Feed Tank	17800 gallons				8760 hr/yr
EQT 0520	69A-T-39 - No. 7 VersaTrans Feed Tank	7500 gallons				8760 hr/yr
EQT 0521	69A-T-41 - No. 8 VersaTrans Feed Tank	17500 gallons				8760 hr/yr
EQT 0522	69A-T-42 - No. 9 VersaTrans Feed Tank	17500 gallons				8760 hr/yr
EQT 0525	69A-T-48 - No. 12 VersaTrans Feed Tank	1612 gallons				8760 hr/yr
EQT 0526	69A-T-49 - No. 12 VersaTrans Feed Tank	1612 gallons				8760 hr/yr
EQT 0527	64A-T-1 - EC Reactor Dump Tank	15120 gallons				8760 hr/yr

**INVENTORIES**

**AI ID: 1255 - PPG Industries Inc - Lake Charles Complex**  
**Activity Number: PER20090024**  
**Permit Number: 2350-V2**  
**Air - Title V Regular Permit Renewal**

**Subject Item Inventory:**

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
<b>Greater EDC</b>						
EQT 0528	64A-T-7 - EC Day Tank No. 1	52270 gallons				8760 hr/yr
EQT 0529	64A-T-8 - EC Day Tank No. 2	52270 gallons				8760 hr/yr
EQT 0530	64A-T-9 - EC Day Tank No. 3	52270 gallons				8760 hr/yr
EQT 0531	64A-T-10 - EC Day Tank No. 4	52270 gallons				8760 hr/yr
EQT 0534	62A-T-107 - No. 1 Strong Acid Tank	20000 gallons				8760 hr/yr
EQT 0535	62A-T-108 - No. 2 Strong Acid Tank	20000 gallons				8760 hr/yr
EQT 0536	62A-T-109 - No. 1 Weak Acid Tank	20000 gallons				8760 hr/yr
EQT 0537	62A-T-110 - No. 2 Weak Acid Tank	20000 gallons				8760 hr/yr
EQT 0542	562A - EDC Potable Carbon Drum Control CD 1-10					300 hr/yr
RLP 0365	61A-C-2 - Versa Trans Heavies Still System					8760 hr/yr
RLP 0366	61A-C-1 - TCE Stripper System					8760 hr/yr
RLP 0367	61A-C-10 - VDC DH Still System					8760 hr/yr
RLP 0368	61A-C-3 - VDC Product Still System					8760 hr/yr
RLP 0369	60A-T-1103 - No. 1 HCl Stripper System					8760 hr/yr
RLP 0370	60A-C-300 - No. 2 HCl Stripper System					8760 hr/yr
RLP 0371	60A-T-1101 - No. 4 HCl Stripper System					8760 hr/yr
RLP 0372	60A-C-303 - No. 2 EDC Heavies Still System					8760 hr/yr
RLP 0373	60A-C-208 - No. 3 EDC Heavies Still System					8760 hr/yr
RLP 0374	67D-C-101 - Recovery Still System					8760 hr/yr
RLP 0375	60A-T-310 - EDC Dopp Kettle System					8760 hr/yr
RLP 0376	67D-C-103 - ECB Still System					8760 hr/yr
RLP 0377	64A-C-1 - EC Primary Stripper System					8760 hr/yr
RLP 0378	64A-C-3 - EC Secondary Stripper System					8760 hr/yr
RLP 0379	64A-C-2 - EC Heavies Stripper System					8760 hr/yr
RLP 0380	64A-T-20 - EC Flasher Dopp System					8760 hr/yr
RLP 0381	64A-T-21 - EC Bottoms Dopp System					8760 hr/yr
RLP 0382	62A-E-118 - No. 2 HCl Absorber System					8760 hr/yr
RLP 0383	62A-E-108 - No. 4 HCl Absorber System					8760 hr/yr
RLP 0384	62A-E-107 - No. 5 HCl Absorber System					8760 hr/yr
RLP 0385	62A-C-102 - No. 2 HCl Tails Tower System					8760 hr/yr
RLP 0386	62A-C-104 - No. 4 HCl Tails Tower System					8760 hr/yr
RLP 0387	62A-C-105 - No. 5 HCl Tails Tower System					8760 hr/yr
RLP 0388	60A-R-1001 - No. 1 LP-EDC Reactor system					8760 hr/yr
RLP 0389	60A-R-301 - No. 3 LP-EDC Reactor system					8760 hr/yr
RLP 0390	61A-R-2 - VersaTrans Reactor System					8760 hr/yr
RLP 0391	61A-R-1 - EC Reactor System					8760 hr/yr

**INVENTORIES**

**AI ID: 1255 - PPG Industries Inc - Lake Charles Complex**  
**Activity Number: PER20090024**  
**Permit Number: 2350-V2**  
**Air - Title V Regular Permit Renewal**

**Stack Information:**

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
<b>Greater EDC</b>							
EQT 0487	300 - No. 1 LP-EDC Scrubber	22.41	264	.5		90	80
EQT 0488	301 - No. 2 LP-EDC Scrubber	22.41	264	.5		100	80
EQT 0489	302 - VDCM\versaTrans Scrubber	15.53	264	.5		88	80
EQT 0490	337 - VCM-1 Plant Scrubber	1.23	225	1.97		35	80
EQT 0491	338 - HCl Tails Tower Scrubber	.72	3.7	.33		50	80
EQT 0493	373 - North Rubber Lined Acid Storage Tank			1		6	80
EQT 0494	374 - South Rubber Lined Acid Storage Tank			1		6	80
EQT 0495	533D - Cooling Tower, EDC\versaTrans	35.07	238000	12		42	115
EQT 0496	533E - Cooling Tower, EC/HCl	232.2	1575640	12		34	115
EQT 0542	562A - EDC Portable Carbon Drum Control CD 1-10			.25		4	80

**Relationships:**

**Subject Item Groups:**

ID	Group Type	Group Description
CRG 0006	Common Requirements Group	- Scrubbers
CRG 0007	Common Requirements Group	- Cooling Towers
CRG 0008	Common Requirements Group	- Storage Tanks Group A
CRG 0009	Common Requirements Group	- Reactors/Process Vents
CRG 0014	Common Requirements Group	- Surge Control Vessels
CRG 0015	Common Requirements Group	- Storage/Surge Control Vessels
CRG 0017	Common Requirements Group	- Storage Tanks Group B
UNF 0010	Unit or Facility Wide	- Greater EDC

**Group Membership:**

ID	Description	Member of Groups
EQT 0487	300 - No. 1 LP-EDC Scrubber	CRG000000000006
EQT 0488	301 - No. 2 LP-EDC Scrubber	CRG000000000006
EQT 0489	302 - VDCM\versaTrans Scrubber	CRG000000000006
EQT 0490	337 - VCM-1 Plant Scrubber	CRG000000000006
EQT 0495	533D - Cooling Tower, EDC\versaTrans	CRG000000000007
EQT 0496	533E - Cooling Tower, EC/HCl	CRG000000000007
EQT 0497	60A-T-109 - No. 1 EDC Day Tank	CRG000000000008
EQT 0498	60A-T-110 - No. 2 EDC Day Tank	CRG000000000008
EQT 0499	60A-T-202 - No. 3 EDC Day Tank	CRG000000000008

**INVENTORIES**

**AI ID: 1255 - PPG Industries Inc - Lake Charles Complex**  
**Activity Number: PER20090024**  
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**Air - Title V Regular Permit Renewal**

Group Membership:		ID	Description	Member of Groups
		EQT 0500	60A-T-201 - No. 6 EDC Day Tank	CRG00000000017
		EQT 0501	60A-T-304 - No. 7 EDC Day Tank	CRG00000000017
		EQT 0502	60A-T-307 - No. 8 EDC Day Tank	CRG00000000017
		EQT 0503	60A-T-308 - Heavies Still Bottoms Tank	CRG00000000015
		EQT 0504	60A-T-3 - EDC Million Gallon Tank	CRG00000000017
		EQT 0505	61A-T-313 - No. 1 VDCM Storage Tank	CRG00000000017
		EQT 0506	61A-T-312 - No. 2 VDCM Storage Tank	CRG00000000017
		EQT 0507	61A-T-311 - No. 4 VersaTrans Storage Tank	CRG00000000014
		EQT 0508	61A-T-61080 - No. 5 VDCM Storage Tank	CRG00000000015
		EQT 0509	61A-T-109 - No. 1 VDCM Day Tank	CRG00000000015
		EQT 0510	61A-T-114 - No. 2 VDCM Day Tank	CRG00000000015
		EQT 0512	63G-T-61949 - No. 1 VersaTrans Product Tank	CRG00000000015
		EQT 0513	61A-T-105 - No. 2 VersaTrans Product Tank	CRG00000000014
		EQT 0514	60A-T-301 - No. 1 VersaTrans Feed/No. 3 EDC Dump Tank	CRG00000000015
		EQT 0515	61A-T-22 - No. 2 VersaTrans Feed Tank	CRG00000000015
		EQT 0516	61A-T-23 - No. 3 VersaTrans Feed Tank	CRG00000000015
		EQT 0517	61A-T-24 - No. 4 VersaTrans Feed Tank	CRG00000000015
		EQT 0518	60A-T-1010 - No. 5 VersaTrans Feed/No. 1 EDC Dump Tank	CRG00000000015
		EQT 0519	63G-T-62793 - No. 6 VersaTrans Feed Tank	CRG00000000015
		EQT 0520	69A-T-39 - No. 7 VersaTrans Feed Tank	CRG00000000015
		EQT 0521	69A-T-41 - No. 8 VersaTrans Feed Tank	CRG00000000015
		EQT 0522	69A-T-42 - No. 9 VersaTrans Feed Tank	CRG00000000015
		EQT 0525	69A-T-48 - No. 12 VersaTrans Feed Tank	CRG00000000015
		EQT 0526	69A-T-49 - No. 12 VersaTrans Feed Tank	CRG00000000015
		EQT 0527	64A-T-1 - EC Reactor Dump Tank	CRG00000000015
		EQT 0528	64A-T-7 - EC Day Tank No. 1	CRG00000000017
		EQT 0529	64A-T-8 - EC Day Tank No. 2	CRG00000000017
		EQT 0530	64A-T-9 - EC Day Tank No. 3	CRG00000000017
		EQT 0531	64A-T-10 - EC Day Tank No. 4	CRG00000000017
		RLP 0365	61A-C-2 - Versa Trans Heavies Still System	CRG00000000009
		RLP 0366	61A-C-1 - TCE Stripper System	CRG00000000009
		RLP 0367	61A-C-10 - VDC DH Still System	CRG00000000009
		RLP 0368	61A-C-3 - VDC Product Still System	CRG00000000009
		RLP 0369	60A-T-1103 - No. 1 HCl Stripper System	CRG00000000009
		RLP 0370	60A-C-300 - No. 2 HCl Stripper System	CRG00000000009
		RLP 0371	60A-T-1101 - No. 4 HCl Stripper System	CRG00000000009
		RLP 0372	60A-C-303 - No. 2 EDC Heavies Still System	CRG00000000009
		RLP 0373	60A-C-208 - No. 3 EDC Heavies Still System	CRG00000000009
		RLP 0374	67D-C-101 - Recovery Still System	CRG00000000009
		RLP 0375	60A-T-310 - EDC Dopp Kettle System	CRG00000000009
		RLP 0376	67D-C-103 - ECB Still System	CRG00000000009

**INVENTORIES**

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex  
 Activity Number: PER20090024  
 Permit Number: 2350-V2  
 Air - Title V Regular Permit Renewal

**Group Membership:**

ID	Description	Member of Groups
RLP 0388	60A-R-1001 - No. 1 LP-EDC Reactor system	CRG00000000009
RLP 0389	60A-R-301 - No. 3 LP-EDC Reactor system	CRG00000000009
RLP 0390	61A-R-2 - VersaTrans Reactor System	CRG00000000009
RLP 0391	61A-R-1 - EC Reactor System	CRG00000000009

**NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group**

**Annual Maintenance Fee:**

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0620	0620 Halogenated Hydrocarbons (Rated Capacity)	2792.3	MM lbs/yr

**SIC Codes:**

2812	Alkalies and chlorine	AI 1255
2819	Industrial inorganic chemicals, nec	AI 1255
2869	Industrial organic chemicals, nec	AI 1255

**EMISSION RATES FOR CRITERIA POLLUTANTS**

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex  
 Activity Number: PER20090024

Permit Number: 2350-V2

Air - Title V Regular Permit Renewal

Subject Item	CO			PM10			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
<b>Greater EDC</b>									
EQT 0487 300	13.94	20.91	0.06				1198.02	3570.66	9.57
EQT 0488 301	1.38	2.07	0.01				1281.32	3613.69	9.75
EQT 0489 302							8.06	11.53	0.03
EQT 0490 337							100.80	151.20	0.40
EQT 0491 338							3.95	4.74	17.29
EQT 0493 373							<0.01	<0.01	<0.01
EQT 0494 374							<0.01	<0.01	<0.01
EQT 0495 533D				0.73		3.20	0.76		3.31
EQT 0496 533E				0.32		1.38	0.33		1.46
EQT 0542 562A							0.94	1.41	0.14

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex

Activity Number: PER20090024

Permit Number: 2350-V2

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0487 300	1,1,1-Trichloroethane	1.15	1.73	<0.01
	1,1,2-Trichloroethane	0.002	0.003	<0.01
	1,1-Dichloroethane	0.59	0.88	<0.01
	1,2-Dichloroethane	69.606	207.000	0.557
	Carbon tetrachloride	1.62	2.43	0.01
	Chlorine	<0.001	<0.001	<0.01
	Chloroethane	15.34	29.06	0.12
	Chloroform	0.75	1.12	<0.01
	Dichloromethane	<0.001	<0.001	<0.01
	Hydrochloric acid	13.49	40.48	0.11
	Methyl chloride	0.07	0.11	<0.01
	Trichloroethylene	0.04	0.05	<0.01
	Vinyl chloride	0.003	0.005	<0.01
	Vinylidene chloride	<0.001	<0.001	<0.01
EQT 0488 301	1,1,1-Trichloroethane	0.01	0.01	<0.01
	1,1,2-Trichloroethane	0.001	0.002	<0.01
	1,1-Dichloroethane	0.004	0.01	<0.01
	1,2-Dichloroethane	76.683	207.000	0.613
	Carbon tetrachloride	0.01	0.01	<0.01
	Chlorine	<0.001	<0.001	<0.01
	Chloroethane	27.97	76.63	0.22
	Chloroform	0.004	0.01	<0.01
	Dichloromethane	<0.001	<0.001	<0.01
	Hydrochloric acid	3.63	10.89	0.03
	Methyl chloride	0.004	0.01	<0.01
	Trichloroethylene	0.003	0.005	<0.01
	Vinyl chloride	0.02	0.03	<0.01
	Vinylidene chloride	<0.001	<0.001	<0.01
EQT 0489 302	1,1,2-Trichloroethane	3.08	4.62	0.01
	1,2-Dichloroethane	3.078	4.616	0.012
	Hydrochloric acid	0.02	0.03	<0.01
	Tetrachloroethylene	0.11	0.17	<0.01
	Vinylidene chloride	0.30	0.45	<0.01

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex

Activity Number: PER20090024

Permit Number: 2350-V2

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0490 337	Hydrochloric acid	3.30	4.95	0.01
EQT 0491 338	1,1,2-Trichloroethane	0.003	0.003	0.01
	1,1-Dichloroethane	<0.001	0.001	<0.01
	1,2-Dichloroethane	0.043	0.051	0.186
	Chloroethane	<0.001	<0.001	<0.01
	Chloroform	0.09	0.10	0.38
	Hydrochloric acid	0.02	0.03	0.10
	Trichloroethylene	<0.03	0.03	0.12
	Vinyl chloride	0.001	0.001	<0.01
	Vinylidene chloride	<0.001	<0.001	<0.01
EQT 0493 373	1,2-Dichloroethane	<0.001	<0.001	<0.001
	Hydrochloric acid	0.02	0.03	0.10
EQT 0494 374	1,2-Dichloroethane	<0.001	<0.001	0.001
	Hydrochloric acid	0.04	0.04	0.15
EQT 0495 533D	1,1,2-Trichloroethane	0.02		0.07
	1,1-Dichloroethane	0.004		0.02
	1,2-Dichloroethane	0.635		2.781
	Chlorine	0.001		0.01
	Chloroethane	0.02		0.10
	Chloroform	0.02		0.07
	Hexachloroethane	0.004		0.02
	Trichloroethylene	0.01		0.03
EQT 0496 533E	1,1-Dichloroethane	0.002		0.01
	1,2-Dichloroethane	0.013		0.059
	Chlorine	0.002		0.01
	Chloroethane	0.31		1.37
	Chloroform	0.003		0.01
	Vinylidene chloride	0.003		0.01
EQT 0542 562A	1,1,1-Trichloroethane	<0.001	0.001	<0.01
	1,1,2,2-Tetrachloroethane	<0.001	0.001	<0.01
	1,1,2-Trichloroethane	<0.001	0.001	<0.01
	1,1-Dichloroethane	<0.001	0.001	<0.01
	1,2-Dichloroethane	0.938	1.407	0.141

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex

Activity Number: PER20090024

Permit Number: 2350-V2

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0542 562A	Carbon tetrachloride	<0.001	0.001	<0.01
	Chloroethane	<0.001	0.001	<0.01
	Chloroform	<0.001	0.001	<0.01
	Trichloroethylene	<0.001	0.001	<0.01
UNF 0010	1,1,1-Trichloroethane			<0.01
	1,1,2,2-Tetrachloroethane			<0.01
	1,1,2-Trichloroethane			0.09
	1,1-Dichloroethane			0.03
	1,2-Dichloroethane			4.359
	Carbon tetrachloride			0.01
	Chlorine			0.02
	Chloroethane			1.81
	Chloroform			0.46
	Dichloromethane			<0.01
	Hexachloroethane			0.02
	Hydrochloric acid			0.50
	Methyl chloride			<0.01
	Tetrachloroethylene			<0.01
	Trichloroethylene			0.15
Vinyl chloride			0.01	
Vinylidene chloride			<0.01	

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

**SPECIFIC REQUIREMENTS**

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex

Activity Number: PER20090024

Permit Number: 2350-V2

Air - Title V Regular Permit Renewal

**CRG 0006 - Scrubbers**

Group Members: EQT 0487EQT 0488EQT 0489EQT 0490

- 1 [LAC 33:III.5109.A.1] Emissions are controlled by scrubber - determined as MACT.

**CRG 0007 - Cooling Towers**

Group Members: EQT 0495EQT 0496

- 2 [40 CFR 63.104(b)] Heat exchange systems (cooling water): HAP monitored by the regulation's specified method(s) monthly for the first 6 months and quarterly thereafter to detect leaks. Monitor for total hazardous air pollutants, total volatile organic compounds, total organic carbon, one or more speciated HAP compounds, or other representative substances that would indicate the presence of a leak in the heat exchange system. Subpart F. [40 CFR 63.104(b)]
- 3 [40 CFR 63.104(d)] Which Months: All Year Statistical Basis: None specified  
Heat exchange systems: Repair leaks as soon as practicable but not later than 45 calendar days after receiving results of monitoring tests indicating a leak, if a leak is detected according to the criteria of 40 CFR 63.104(b) or (c). Once the leak has been repaired, confirm that the heat exchange system has been repaired within 7 calendar days of the repair or startup, whichever is later. Subpart F. [40 CFR 63.104(d)]  
Comply with the reporting requirements of 40 CFR 63.104(f)(2). Subpart F. [40 CFR 63.104(f)(2)]
- 4 [40 CFR 63.104(f)(2)] Heat exchange systems: Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Retain the records identified in 40 CFR 63.104(f)(i) through (iv) as specified in 40 CFR 63.103(c)(1). Subpart F. [40 CFR 63.104(f)]
- 5 [40 CFR 63.104(f)] Compliance with NESHAP 40 CFR 63 Subpart F has been determined to be compliance with MACT in accordance with LAC 33:III.5109.A.2.
- 6 [LAC 33:III.5109.A.1]

**CRG 0008 - Storage Tanks Group A**

Group Members: EQT 0497EQT 0498EQT 0499

- 7 [40 CFR 63.119(a)(1)] Reduce hazardous air pollutants emissions to the atmosphere either by operating and maintaining a fixed roof and internal floating roof, an external floating roof, an internal floating roof converted to an internal floating roof, a closed-vent system and control device, routing the emissions to a process or a fuel gas system, or vapor balancing in accordance with the requirements in 40 CFR 63.119(b), (c), (d), (e), (f), or (g) or equivalent as provided in 40 CFR 63.121. Subpart G. [40 CFR 63.119(a)(1)]  
Submit a Notification of Compliance Status as required by 40 CFR 63.152(b). Include the information specified in 40 CFR 63.122(c). Subpart G. [40 CFR 63.122(a)(3)]
- 8 [40 CFR 63.122(a)(3)] Submit Periodic Reports as required by 40 CFR 63.152(d). Include the information specified in 40 CFR 63.122(d), (e), (f), and (g). Subpart G. [40 CFR 63.122(a)(4)]
- 9 [40 CFR 63.122(a)(4)] Submit, as applicable, other reports as required by 40 CFR 63.152(d). Include the information specified in 40 CFR 63.122(h). Subpart G. [40 CFR 63.122(a)(5)]
- 10 [40 CFR 63.122(a)(5)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep readily accessible records of the information specified in 40 CFR 63.123(a) through (i), as applicable. Keep the records as long as the storage vessel retains Group 1 status and is in operation. Subpart G.
- 11 [40 CFR 63.123]

**SPECIFIC REQUIREMENTS**

**AI ID: 1255 - PPG Industries Inc - Lake Charles Complex**  
**Activity Number: PER20090024**  
**Permit Number: 2350-V2**  
**Air - Title V Regular Permit Renewal**

**CRG 0008 - Storage Tanks Group A**

- 12 [LAC 33:III.2103.E.1] VOC, Total >= 95 % control efficiency using a vapor loss control system. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.  
 Which Months: All Year Statistical Basis: None specified
- 13 [LAC 33:III.2103.E] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 14 [LAC 33:III.2103.H.3] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-c.
- 15 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 16 [LAC 33:III.501.C.6] Emissions are controlled by combustion devices and scrubbers, which are included in the permit for the Incinerators Area, or are controlled by carbon adsorption, the backup control device with VOC control efficiency of 95% or greater.
- 17 [LAC 33:III.5107.A.2] Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
- 18 [LAC 33:III.5109.A.1] Compliance with NESHAP 40 CFR 63 Subpart G has been determined to be compliance with MACT in accordance with LAC 33:III.5109.A.2.

**CRG 0009 - Reactors/Process Vents**

- Group Members: RLP 0365 RLP 0366 RLP 0367 RLP 0368 RLP 0369 RLP 0370 RLP 0371 RLP 0372 RLP 0373 RLP 0374 RLP 0375 RLP 0376 RLP 0388 RLP 0389 RLP 0390 RLP 0391
- 19 [40 CFR 63.113(a)(2)] Organic HAP >= 98 % reduction by weight, or <= 20 ppmv, whichever is less stringent, as determined using the methods in 40 CFR 63.116(c). Subpart G. [40 CFR 63.113(a)(2)]  
 Which Months: All Year Statistical Basis: None specified
  - 20 [40 CFR 63.113(c)(1)(iii)] Halogenated vent streams: Hydrogen halides and halogens >= 95 % reduction, or reduce the outlet mass of total hydrogen halides and halogens < 0.45 kg/hr, whichever is less stringent, using a halogen reduction device. Subpart G. [40 CFR 63.113(c)(1)(ii)]  
 Which Months: All Year Statistical Basis: None specified
  - 21 [40 CFR 63.117(a)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep up-to-date, readily accessible records of the data specified in 40 CFR 63.117(a)(4) through (a)(8), as applicable. Subpart G. [40 CFR 63.117(a)]
  - 22 [LAC 33:III.501.C.6] Emissions are controlled by combustion devices and scrubbers, which are included in the permit for the Incinerators Area.

**CRG 0014 - Surge Control Vessels**

- Group Members: EQT 0507EQT 0508EQT 0513
- 23 [40 CFR 63.170] Surge control vessels and bottoms receivers: Equip with a closed-vent system that routes the organic vapors vented from the surge control vessel or bottoms receiver back to the process or to a control device that complies with the requirements of 40 CFR 63.172, except as provided in 40 CFR 63.162(b), or comply with the requirements of 40 CFR 63.119(b) or (c), if surge control vessel or bottoms receiver is not routed back to the process and meets the conditions specified in 40 CFR 63 Subpart H Table 2 or Table 3. Subpart H.

**SPECIFIC REQUIREMENTS**

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex

Activity Number: PER20090024

Permit Number: 2350-V2

Air - Title V Regular Permit Renewal

**CRG 0014 - Surge Control Vessels**

- 24 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 25 [LAC 33:III.2103.E.1] VOC, Total  $\geq$  95 % control efficiency using a vapor loss control system. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
- 26 [LAC 33:III.2103.1] Which Months: All Year Statistical Basis: None specified  
Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.1.1 - 7, as applicable.
- 27 [LAC 33:III.501.C.6] Emissions are controlled by combustion devices and scrubbers, which are included in the permit for the Incinerators Area.

**CRG 0015 - Storage/Surge Control Vessels**

- Group Members: EQT 0503EQT 0509EQT 0510EQT 0512EQT 0514EQT 0515EQT 0516EQT 0517EQT 0518EQT 0519EQT 0520EQT 0521EQT 0522EQT 0525EQT 0526EQT 0527
- 28 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 29 [LAC 33:III.2103.E.1] VOC, Total  $\geq$  95 % control efficiency using a vapor loss control system. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
- 30 [LAC 33:III.2103.1] Which Months: All Year Statistical Basis: None specified  
Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.1.1 - 7, as applicable.
- 31 [LAC 33:III.501.C.6] Emissions are controlled by combustion devices and scrubbers, which are included in the permit for the Incinerators Area.

**CRG 0017 - Storage Tanks Group B**

- Group Members: EQT 0500EQT 0501EQT 0502EQT 0504EQT 0505EQT 0506EQT 0528EQT 0529EQT 0530EQT 0531
- 32 [40 CFR 63.119(a)(1)] Reduce hazardous air pollutants emissions to the atmosphere either by operating and maintaining a fixed roof and internal floating roof, an external floating roof, an external floating roof converted to an internal floating roof, a closed-vent system and control device, routing the emissions to a process or a fuel gas system, or vapor balancing in accordance with the requirements in 40 CFR 63.119(b), (c), (d), (e), (f), or (g) or equivalent as provided in 40 CFR 63.121. Subpart G. [40 CFR 63.119(a)(1)]
- 33 [40 CFR 63.122(a)(3)] Submit a Notification of Compliance Status as required by 40 CFR 63.152(b). Include the information specified in 40 CFR 63.122(c). Subpart G. [40 CFR 63.122(a)(3)]
- 34 [40 CFR 63.122(a)(4)] Submit Periodic Reports as required by 40 CFR 63.152(d). Include the information specified in 40 CFR 63.122(d), (e), (f), and (g). Subpart G. [40 CFR 63.122(a)(4)]
- 35 [40 CFR 63.122(a)(5)] Submit, as applicable, other reports as required by 40 CFR 63.152(d). Include the information specified in 40 CFR 63.122(h). Subpart G. [40 CFR 63.122(a)(5)]

**SPECIFIC REQUIREMENTS**

**AI ID: 1255 - PPG Industries Inc - Lake Charles Complex**  
**Activity Number: PER20090024**  
**Permit Number: 2350-V2**  
**Air - Title V Regular Permit Renewal**

**CRG 0017 - Storage Tanks Group B**

- 36 [40 CFR 63.123] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep readily accessible records of the information specified in 40 CFR 63.123(a) through (i), as applicable. Keep the records as long as the storage vessel retains Group 1 status and is in operation. Subpart G.
- 37 [LAC 33:III.2103.B] Equip with a submerged fill pipe.
- 38 [LAC 33:III.2103.E.1] VOC, Total >= 95 % control efficiency using a vapor loss control system. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.
- 39 [LAC 33:III.2103.E] Which Months: All Year Statistical Basis: None specified
- 40 [LAC 33:III.2103.H.3] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 41 [LAC 33:III.2103.I] Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 42 [LAC 33:III.501.C.6] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 43 [LAC 33:III.501.C.6] Emissions are controlled by combustion devices and scrubbers, which are included in the permit for the Incinerators Area, or are controlled by carbon adsorption, the backup control device with VOC control efficiency of 95% or greater.
- 44 [LAC 33:III.5107.A.2] Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
- 45 [LAC 33:III.5109.A.1] Compliance with NESHAP 40 CFR 63 Subpart G has been determined to be compliance with MACT in accordance with LAC 33:III.5109.A.2.

**EQT 0491 338 - HCl Tails Tower Scrubber**

- 46 [LAC 33:III.5107.A.2] Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
- 47 [LAC 33:III.5109.A.1] Emissions are controlled by scrubber - determined as MACT.

**EQT 0493 373 - North Rubber Lined Acid Storage Tank**

- 48 [LAC 33:III.5109.A] Very low: Class I/II TAP emissions. No further control is required.

**EQT 0494 374 - South Rubber Lined Acid Storage Tank**

- 49 [LAC 33:III.5109.A] Very low: Class I/II TAP emissions. No further control is required.

**EQT 0511 61A-T-17 - No. 3 VDCM Day Tank**

**SPECIFIC REQUIREMENTS**

AI ID: 1255 - PPG Industries Inc - Lake Charles Complex  
 Activity Number: PER20090024  
 Permit Number: 2350-V2  
 Air - Title V Regular Permit Renewal

**EQT 0511 61A-T-17 - No. 3 VDCM Day Tank**

- 49 [40 CFR 63.123(a)] Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]
- 50 [LAC 33:III.2103.A] Equip with a vapor loss control system, consisting of a gathering system capable of collecting volatile organic compound vapors and a vapor disposal system capable of processing such organic vapors. All tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
- 51 [LAC 33:III.2103.E.1] VOC. Total >= 95 % control efficiency using a vapor loss control system. This limitation does not apply during periods of planned routine maintenance which may not exceed 240 hours per year.  
 Which Months: All Year Statistical Basis: None specified  
 Determine VOC maximum true vapor pressure using the methods in LAC 33:III.2103.H.3.a-e.
- 52 [LAC 33:III.2103.H.3] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.
- 53 [LAC 33:III.2103.I] Emissions are controlled by combustion devices and scrubbers, which are included in the permit for the Incinerators Area.
- 54 [LAC 33:III.501.C.6]

**EQT 0542 562A - EDC Portable Carbon Drum Control CD 1-10**

- 55 [40 CFR 63.113(a)(2)] Organic HAP >= 98 % reduction by weight, or <= 20 ppmv, whichever is less stringent, as determined using the methods in 40 CFR 63.116(c). For combustion devices, calculate emission reduction or concentration on a dry basis, corrected to 3-percent oxygen. Subpart G. [40 CFR 63.113(a)(2)]  
 Which Months: All Year Statistical Basis: None specified  
 Utilize the appropriate monitoring device identified in 40 CFR 63.114(b)(1), (b)(2), or (b)(3). Subpart G. [40 CFR 63.114(a)(5)]  
 Conduct a performance test using the procedures in 40 CFR 63.116(c)(1) through (c)(4). Subpart G. [40 CFR 63.116(c)]
- 56 [40 CFR 63.114(a)(5)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep up-to-date, readily accessible records of the data specified in 40 CFR 63.117(a)(4) through (a)(8), as applicable. Subpart G. [40 CFR 63.117(a)]
- 57 [40 CFR 63.116(c)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep up-to-date, readily accessible records of the data specified in 40 CFR 63.118(a)(1) through (a)(4). Subpart G. [40 CFR 63.118(a)]
- 58 [40 CFR 63.117(a)] Inlet emissions: Organic HAP >= 95 % reduction, except as provided in 40 CFR 63.119(e)(2). If a flare is used, it shall meet the specifications described in the general control device requirements of 40 CFR 63.11(b). Subpart G. [40 CFR 63.119(e)(1)]  
 Which Months: All Year Statistical Basis: None specified
- 59 [40 CFR 63.118(a)] Do not exceed 240 hours per year of periods of planned routine maintenance of the control device, during which the control device does not meet the specifications of 40 CFR 63.119(e)(1) or (e)(2). Subpart G. [40 CFR 63.119(e)(3)]
- 60 [40 CFR 63.119(e)(1)] Prepare a design evaluation, which includes the information specified in 40 CFR 63.120(d)(1)(i), or submit the results of a performance test as described in 40 CFR 63.120(d)(1)(ii). Subpart G. [40 CFR 63.120(d)(1)]
- 61 [40 CFR 63.119(c)(3)] Monitor the parameters specified in the Notification of Compliance Status required in 40 CFR 63.15(b) or in the operating permit and operate and maintain the control device such that the monitored parameters remain within the ranges specified in the Notification of Compliance Status. Subpart G. [40 CFR 63.120(d)(5)]
- 62 [40 CFR 63.120(d)(1)]
- 63 [40 CFR 63.120(d)(5)]

**SPECIFIC REQUIREMENTS**

**AI ID: 1255 - PPG Industries Inc - Lake Charles Complex**  
**Activity Number: PER20090024**  
**Permit Number: 2350-V2**  
**Air - Title V Regular Permit Renewal**

**EQT 0542 562A - EDC Portable Carbon Drum Control CD 1-10**

- 64 [40 CFR 63.129] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.129(a) through (f). Subpart G.
- 65 [LAC 33:III.5107.A.2] Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.
- 66 [LAC 33:III.5109.A.1] Compliance with NESHAP 40 CFR 63 Subpart G has been determined to be compliance with MACT in accordance with LAC 33:III.5109.A.2.

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- 67 [40 CFR 61.145(b)(1)] Provide DEQ with written notice of intention to demolish or renovate prior to performing activities to which 40 CFR 61 Subpart M applies. Delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery is acceptable. Subpart M. 140 CFR 61.145(b)(1)
- 68 [40 CFR 61.148] Do not install or reinstall on a facility component any insulating materials that contain commercial asbestos if the materials are either molded and friable or wet-applied and friable after drying. Subpart M.
- 69 [40 CFR 61.355] Determine compliance with 40 CFR 61 Subpart FF using the test methods and procedures specified in 40 CFR 61.355(a) through (i), as applicable. Subpart FF.
- 70 [40 CFR 61.356] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency Maintain records as specified in 40 CFR 61.356(a) through (n), as applicable. Maintain each record in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified. Subpart FF.
- 71 [40 CFR 61.357(b)] Submit report: Due whenever there is a change in the process generating the waste stream that could cause the total annual benzene quantity from facility waste to increase to 1 Mg/yr (1.1 ton/yr) or more. Submit updates to the information listed in 40 CFR 61.357(a)(1) through (a)(3). Subpart FF. [40 CFR 61.357(b)]
- 72 [40 CFR 61.] All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart A.
- 73 [40 CFR 63.152(b)(2)(iii)] For purposes of determining daily average values of monitored parameters, an operating day is from 7:00 A.M. to 6:59 A.M. [40 CFR 63.152(b)(2)(iii)]
- 74 [40 CFR 63.] All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A.
- 75 [40 CFR 68.12(b)(1)] Equipment/operational data recordkeeping by electronic or hard copy continuously. Document that the nearest public receptor is beyond the distance to a toxic or flammable endpoint defined in 68.22. [40 CFR 68.12(b)(1)]
- 76 [40 CFR 68.12(b)(2)] Complete the five-year accident history for the process as provided in 68.42. [40 CFR 68.12(b)(2)]
- 77 [40 CFR 68.12(b)(3)] Ensure that response actions have been coordinated with local emergency planning and response agencies. [40 CFR 68.12(b)(3)]
- 78 [40 CFR 68.12(b)(4)] Include in the RMP the certification specified in 68.12(b)(4). [40 CFR 68.12(b)(4)]
- 79 [40 CFR 68.150] Submit Risk Management Plan (RMP): Due no later than June 21, 1999, or three years after the date on which a regulated substance is first listed under 68.130, or the date on which a regulated substance is first present above a threshold quantity in a process. Submit in a method and format to a central point as specified by EPA prior to June 21, 1999.
- 80 [40 CFR 68.155] Provide in the RMP an executive summary that includes a brief description of the elements listed in 68.155(a) through (g).
- 81 [40 CFR 68.160] Complete a single registration form and include in the RMP. Cover all regulated substances handled in covered processes. Include in the registration the information specified in 68.160(b)(1) through (13).

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- 82 [40 CFR 68.165] Submit in the RMP information one worst-case release scenario for each Program 1 process. Include the data specified in 68.165(b)(1) through (1.3).
- 83 [40 CFR 68.168] Submit in the RMP the information provided in 68.42(b) on each accident covered by 68.42(a).
- 84 [40 CFR 68.180] Provide in the RMP the emergency response information listed in 68.180(a) through (c).
- 85 [40 CFR 68.190(c)] Submit revised registration to EPA: Due within six months after a stationary source is no longer subject to 40 CFR 68. Indicate that the stationary source is no longer covered. [40 CFR 68.190(c)]
- 86 [40 CFR 68.190] Review and update the RMP as specified in 68.190(b) and submit it in a method and format to a central point specified by EPA prior to June 21, 1999.
- 87 [40 CFR 68.200] Maintain records supporting the implementation of 40 CFR 68 for five years unless otherwise provided.
- 88 [40 CFR 68.22] Use the endpoints specified in 68.22(a) through (g) for analyses of offsite consequences.
- 89 [40 CFR 68.25] Analyze the release scenarios in 68.25, as specified in 68.25(a) through (h).
- 90 [40 CFR 68.28] Identify and analyze at least one alternative release scenario for each regulated toxic substance held in a covered process(es) and at least one alternative release scenario to represent all flammable substances held in covered processes, as specified in 68.28(b) through (e).
- 91 [40 CFR 68.30] Estimate in the RMP the population within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
- 92 [40 CFR 68.33] List in the RMP environmental receptors within a circle with its center at the point of the release and a radius determined by the distance to the endpoint defined in 68.22(a).
- 93 [40 CFR 68.36(b)] Submit revised RMP: Due within six months after changes in processes, quantities stored or handled, or any other aspect of the stationary source increase or decrease the distance to the endpoint by a factor of two or more. [40 CFR 68.36(b)]
- 94 [40 CFR 68.36] Review and update the offsite consequence analyses at least once every five years. Complete a revised analysis within six months if changes in processes, quantities stored or handled, or any other aspect of the stationary source might reasonably be expected to increase or decrease the distance to the endpoint by a factor of two or more.
- 95 [40 CFR 68.39] Equipment/operational data recordkeeping by electronic or hard copy continuously. Maintain the records specified in 68.39(a) through (c) on the offsite consequence analyses.
- 96 [40 CFR 68.42] Include in the five-year accident history all accidental releases from covered processes that resulted in deaths, injuries, or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage. Include the information specified in 68.42(b)(1) through (10) for each accidental release.
- 97 [LAC 33:III.1103] Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited.
- 98 [LAC 33:III.1303.B] Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
- 99 [LAC 33:III.2113.A] Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.

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- 100 [LAC 33:III.2115.K] Equipment/operational data recordkeeping by electronic or hard copy as needed. Maintain records to demonstrate that the criteria are being met for any exemption claimed. Maintain records on the premises for at least two years and make such information available to representatives of the Louisiana Department of Environmental Quality and the Environmental Protection Agency upon request.
- 101 [LAC 33:III.219] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- 102 [LAC 33:III.2901.D] Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
- 103 [LAC 33:III.2901.F] If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.
- 104 [LAC 33:III.501.C.6] The maximum HCl production in the Greater EDC Unit is limited to 30 tons per day. The hourly HCl production in this unit shall be recorded. These records shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. The HCl production any continuous 24-hour period over this limit shall be considered a violation of this permit and must be reported to the Office of Environmental Compliance, Enforcement Division.
- 105 [LAC 33:III.5105.A.1] Do not construct or modify any stationary source subject to any standard set forth in LAC 33:III.Chapter 51. Subchapter A without first obtaining written authorization from DEQ in accordance with LAC 33:III.Chapter 51.Subchapter A, after the effective date of the standard.
- 106 [LAC 33:III.5105.A.2] Do not cause a violation of any ambient air standard listed in LAC 33:III.Table 51.2, unless operating in accordance with LAC 33:III.5109.B.
- 107 [LAC 33:III.5105.A.3] Do not build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard.
- 108 [LAC 33:III.5105.A.4] Do not fail to keep records, notify, report or revise reports as required under LAC 33:III.Chapter 51. Subchapter A.
- 109 [LAC 33:III.5107.A.2] Include a certification statement with the annual emission report and revisions to any emission report that attests that the information contained in the emission report is true, accurate, and complete, and that is signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official.
- 110 [LAC 33:III.5107.A] Submit Annual Emissions Report: Due annually, by the 31st of March unless otherwise directed by DEQ, to the Office of Environmental Assessment in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.
- 111 [LAC 33:III.5107.B.1] Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but in no case later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere that results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).

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- 112 [LAC 33:III.5107.B.2]  
 Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:III.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:III.3923.
- 113 [LAC 33:III.5107.B.3]  
 Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:III.3931. Submit notification in the manner provided in LAC 33:III.3923.
- 114 [LAC 33:III.5107.B.4]  
 Submit written report: Due by certified mail to SPOC within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through B.3. Include the information specified in LAC 33:III.5107.B.4.a.i through B.4.a.viii.
- 115 [LAC 33:III.5107.B.5]  
 Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, IF THEY CAN BE MEASURED AND CAN BE RELIABLY QUANTIFIED USING GOOD ENGINEERING PRACTICES, to DEQ along with the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
- 116 [LAC 33:III.5113.A.1]  
 Submit notification in writing: Due to SPOC not more than 60 days nor less than 30 days prior to initial start-up. Submit the anticipated date of the initial start-up.
- 117 [LAC 33:III.5113.A.2]  
 Submit notification in writing: Due to SPOC within 10 working days after the actual date of initial start-up of the source. Submit the actual date of initial start-up of the source.
- 118 [LAC 33:III.5151.F.1.f]  
 An individual or company contracted to perform a demolition or renovation activity which disturbs RACM must be recognized by the Licensing Board for Contractors to perform asbestos abatement, and shall meet the requirements of LAC 33:III.5151.F.2 and F.3 for each demolition or renovation activity.
- 119 [LAC 33:III.535]  
 Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and the Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC 33:III.537]
- 120 [LAC 33:III.5609.A.1.b]  
 Activate the preplanned abatement strategy listed in LAC 33:III.5611, Table 5 when the administrative authority declares an Air Pollution Alert.
- 121 [LAC 33:III.5609.A.2.b]  
 Activate the preplanned strategy listed in LAC 33:III.5611, Table 6 when the administrative authority declares an Air Pollution Warning.
- 122 [LAC 33:III.5609.A.3.b]  
 Activate the preplanned abatement strategy listed in LAC 33:III.5611, Table 7 when the administrative authority declares an Air Pollution Emergency.
- 123 [LAC 33:III.5609.A]  
 Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency.
- 124 [LAC 33:III.5901.A]  
 Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611, Tables 5, 6, and 7.
- 125 [LAC 33:III.5907]  
 Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.  
 Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur.

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126 [LAC 33:III.919 D]

Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D.

127 [LAC 33:III.927]

Report the unauthorized discharge of any air pollutant into the atmosphere in accordance with LAC 33:1.Chapter 39, Notification Regulations and Procedures for Unauthorized Discharges. Submit written reports to the department pursuant to LAC 33:1.3925. Submit timely and appropriate follow-up reports detailing methods and procedures to be used to prevent similar atmospheric releases.